

Issue Brief

FEDERAL ISSUE BRIEF



Analysis provided for MHA by Larry Goldberg, Goldberg Consulting

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CMS Posts Proposed FY 2025 Hospice Wage Index and Payment Rate Update

The Centers for Medicare & Medicaid Services (CMS) have issued its proposed rule updating the hospice payment rates, wage index and aggregate cap amount for Fiscal Year (FY) 2025.

The rule proposes changes to the Hospice Quality Reporting Program.

The rule also proposes to adopt the most recent Office of Management and Budget statistical area delineations, which would change the hospice wage index.

The rule proposes to clarify current policy related to the “election statement” and the “notice of election”, as well as to add clarifying language regarding hospice certification.

Finally, this rulemaking solicits comments regarding potential implementation of a separate payment mechanism to account for high intensity palliative care services.

A copy of the 120-page rule is at: <https://public-inspection.federalregister.gov/2024-06921.pdf>. Publication is scheduled for April 4, and, of course, this link will change upon publication. A 60-day comment period ending May 28 is provided.

Comment

The overall economic impact of this proposed rule is estimated to be \$705 million in increased payments to hospices in FY 2025. (Page 5)

As required by OMB, CMS provides the following table to explain the changes in overall payments to hospices.

Hospice Payment Update Category	FY 2024 to FY 2025 Transfers
Annualized Monetized Transfers	\$705 million*
From Whom to Whom?	Federal Government to Medicare Hospices
Hospice Quality Reporting Program Category	FY 2026 to FY 2029 Costs
Annualized Costs	\$185 million (2% Discount Rate)

This is another rule that contains no table of contents, we are inserting relative page numbers from the rule’s display version.

Provisions of the Rule (Page 10)

Proposed FY 2024 Hospice Payment Update Percentage (Page 36)

The proposed inpatient hospital market basket percentage increase for FY 2025 is 3.0 percent and is required to be reduced by a productivity adjustment as mandated by section 3401(g) of the **Affordable Care Act**. The proposed productivity adjustment for FY 2025 is 0.4 percentage point (based on IGI’s fourth quarter 2023 forecast). Therefore, the proposed hospice payment update percentage for FY 2025 is **2.6 percent**.

Proposed FY 2025 Hospice Payment Rates (Page 37)

The proposed FY 2025 RHC rates and the proposed FY 2025 payment rates for CHC, IRC, and GIC are shown in the tables below.

Proposed FY 2025 Hospice RHC Payment Rates

Code	Description	FY 2024 Payment Rates	SIA Budget Neutrality Factor	Wage Index Standardization on Factor	Proposed FY 2025 Hospice Payment Update	Propose FY 2025 Payment Rates
651	Routine Home Care (days 1-60)	\$218.33	1.0009	0.9983	X 1.026	\$223.83
651	Routine Home Care (days 61+)	\$172.35	1.0000	0.9975	X 1.026	\$176.39

Proposed FY 2025 Hospice CHC, IRC, and GIC Payment Rates

Code	Description	FY 2024 Payment Rates	Wage Index Standardization Factor	FY 2025 Hospice Payment Update	Proposed FY 2025 Payment Rates
652	Continuous Home Care Full Rate = 24 hours of care	\$1,565.46	1.0026	X 1.026	\$1,610.34 (\$67.10 per hour)
655	Inpatient Respite Care	\$507.71	0.9947	X 1.026	\$518.15
656	General Inpatient Care	\$1,145.31	0.9931	X 1.026	\$1,166.98

The Act requires that, for FY 2014 through FY 2023, the Secretary shall reduce the market basket percentage increase by 2 percentage points and beginning with the FY 2024 Annual Payment Update (APU) and for each subsequent year, the Secretary shall reduce the market basket percentage increase by 4 percentage points for any hospice that does not comply with the quality data submission requirements for that FY.

Hospice RHC Payment Rates for Hospices That **DO NOT Submit the Required Quality Data**

Code	Description	FY 2024 Payment Rates	SIA Budget Neutrality Factor	Wage Index Standardization Factor	FY 2025 Hospice Payment Update of 2.6% minus 4.0 percentage points = -1.4%	Proposed FY 2025 Payment Rates
651	Routine Home Care (days 1-60)	\$218.33	1.0009	0.9983	0.9860	\$215.10
651	Routine Home Care (days 61+)	\$172.35	1.0000	0.9975	0.9860	\$169.51

Proposed FY 2025 Hospice CHC, IRC, and GIP Payment Rates for Hospices That **DO NOT Submit the Required Quality Data**

Code	Description	FY 2024 Payment Rates	Wage Index Standardization Factor	FY 2025 Hospice Payment Update of 2.6% minus 4.0 percentage points = -1.4%	Proposed FY 2025 Payment Rates
652	Continuous Home Care Full Rate = 24 hours of care.	\$1,565.46	1.0026	0.9860	\$1,547.56 (\$64.48 per hour)
655	Inpatient Respite Care	\$507.71	0.9947	0.9860	\$497.95
656	General Inpatient Care	\$1,145.31	0.9931	0.9860	\$1,121.48

Labor Share (Page 37)

Current Labor Shares by Level of Care Unchanged from 2024

	Labor Share	Non-Labor Share
Routine Home Care	66.0 Percent	34.0 Percent
Continuous Home Care	75.2 Percent	24.8 Percent
Inpatient Respite Care	61.0 Percent	39.0 Percent
General Inpatient Care	63.5 Percent	36.5 Percent

Proposed Hospice Cap Amount for FY 2025 (Page 42)

The proposed hospice cap amount for the FY 2025 cap year is \$34,364.85, which is equal to the FY 2024 cap amount (\$33,494.01) updated by the proposed FY 2025 hospice payment update percentage of 2.6 percent.

Proposed Clarifying Regulation Text Changes (Page 42)

CMS proposes to amend § 418.102(b) by adding the physician member of the hospice interdisciplinary group as defined in § 418.56(a)(1)(i), as an individual who may provide the initial certification of terminal illness. CMS also proposes to amend the medical director Condition of Participation § 418.102(c) to include the medical director, or physician designee, as defined at § 418.3, if the medical director is not available, or physician member of the IDG among the specified physicians who may review the clinical information as part of the recertification of the terminal illness.

Request for Information (RFI) on Payment Mechanism for High Intensity Palliative Care Services (Page 48)

CMS is soliciting public comment on the following questions:

- What could eliminate the financial risk commenters previously noted when providing complex palliative treatments and higher intensity levels of hospice care?
- What specific financial risks or costs are of particular concern to hospices that would prevent the provision of higher-cost palliative treatments when appropriate for some beneficiaries? Are there individual cost barriers which may prevent a hospice from providing higher-cost palliative care services? For example, is there a cost barrier related to obtaining the appropriate equipment (for example, dialysis machine)? Or is there a cost barrier related to the treatment itself (for example, obtaining the necessary drugs or access to specialized staff)?
- Should there be any parameters around when palliative treatments should qualify for a different type of payment? For example, we are interested in understanding from hospices who do provide these types of palliative treatments whether the patient is generally in a higher level of care (CHC, GIP) when the decision is made to furnish a higher-cost palliative treatment? Should an additional payment only be applicable when the patient is in RHC?
- Under the hospice benefit, palliative care is defined as patient and family centered care that optimizes quality of life by anticipating, preventing, and treating suffering (§ 418.3). In addition to this definition of palliative care, should CMS consider defining palliative services, specifically regarding high-cost treatments? Note, CMS is not seeking a change to the definition of palliative care but rather should CMS consider defining palliative services with regard to high-cost treatments?
- Should there be documentation that all other palliative measures have been exhausted prior to billing for a payment for a higher-cost treatment? If so, would that continue to be a barrier for hospices?
- Should there be separate payments for different types of higher-cost palliative treatments or one standard payment for any higher-cost treatment that would exceed the per diem rate?

Proposed FY 2025 Hospice Wage Index Update (Page 16)

The proposed hospice wage index is based on the FY 2025 hospital pre-floor, pre-reclassified wage index for hospital cost reporting periods beginning on or after October 1, 2020 and before October 1, 2021 (FY 2020 cost report data). (Page 13)

The proposed hospice wage index file applicable for FY 2025 (October 1, 2024 through September 30, 2025) is available on the CMS website at: <https://www.cms.gov/medicare/payment/fee-for-service-providers/hospice/hospiceregulations-and-notice>. (Page 34)

The hospice floor adjusts pre-floor, pre-reclassified hospital wage index values below 0.8 by a 15 percent increase subject to a maximum wage index value of 0.8.

For example, if County A has a pre-floor, pre-reclassified hospital wage index value of 0.3994, CMS would multiply 0.3994 by 1.15, which equals 0.4593. Since 0.4593 is not greater than 0.8, then County A's hospice wage index would be 0.4593. In another example, if County B has a pre-floor, pre-reclassified hospital wage index value of 0.7440, CMS would multiply 0.7440 by 1.15, which equals 0.8556. Because 0.8556 is greater than 0.8, County B's hospice wage index would be 0.8. (Page 12)

Proposed Implementation of New Labor Market Delineations (Page 16)

On July 21, 2023, OMB issued Bulletin No. 23-01, which updates and supersedes OMB Bulletin No. 20-01, issued on March 6, 2020.

The July 21, 2023 OMB Bulletin No. 23-01 contains a number of significant changes. For example, there are new CBSAs, urban counties that have become rural, rural counties that have become urban, and existing CBSAs that have been split apart.

CMS is proposing to implement the new OMB delineations as described in the July 21, 2023 OMB Bulletin No. 23-01 for the hospice wage index effective beginning in FY 2025.

- **Change to County-Equivalents in the State of Connecticut (Page 18)**

In a June 6, 2022 Notice, the Census Bureau announced that it was implementing the State of Connecticut's request to replace the eight counties in the State with the new "Planning Regions."

CMS is proposing to adopt the planning regions as county equivalents for wage index purposes.

Crosswalk of Connecticut County Equivalents

FIPS County Code	County	Old CBSA or non-urban area	County Code	FY 2025 Planning Region	New CBSA or non-urban area
09001	FAIRFIELD	14860	09190	WESTERN CONNECTICUT	14860
09001	FAIRFIELD	14860	09120	GREATER BRIDGEPORT	14860
09003	HARTFORD	25540	09110	CAPITOL	25540
09005	LITCHFIELD	99907	09160	NORTHWEST HILLS	99907
09007	MIDDLESEX	25540	09130	LOWER CONNECTICUT RIVER VALLEY	25540
09009	NEW HAVEN	35300	09140	NAUGATUCK VALLEY	47930
09009	NEW HAVEN	35300	09170	SOUTH CENTRAL CONNECTICUT	35300
09011	NEW LONDON	35980	09180	SOUTHEASTERN CONNECTICUT	35980
09013	TOLLAND	25540	09110	CAPITOL	25540
09015	WINDHAM	49340	09150	NORTHEASTERN CONNECTICUT	99907

- **Urban Counties That Would Become Rural (Page 19)**

Under the revised OMB statistical area delineations (based upon OMB Bulletin No. 23-01), a total of 53 counties (and county equivalents) that are currently considered urban would be considered rural beginning in FY 2025. They are as follows.

Urban Counties That Would Change to Rural Status

FIPS County Code	County Name	State	Current CBSA	Current CBSA Name
01129	WASHINGTON	AL	33660	Mobile, AL
05025	CLEVELAND	AR	38220	Pine Bluff, AR

FIPS County Code	County Name	State	Current CBSA	Current CBSA Name
05047	FRANKLIN	AR	22900	Fort Smith, AR-OK
05069	JEFFERSON	AR	38220	Pine Bluff, AR
05079	LINCOLN	AR	38220	Pine Bluff, AR
10005	SUSSEX	DE	41540	Salisbury, MD-DE
13171	LAMAR	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA
16077	POWER	ID	38540	Pocatello, ID
17057	FULTON	IL	37900	Peoria, IL
17077	JACKSON	IL	16060	Carbondale-Marion, IL
17087	JOHNSON	IL	16060	Carbondale-Marion, IL
17183	VERMILION	IL	19180	Danville, IL
17199	WILLIAMSON	IL	16060	Carbondale-Marion, IL
18121	PARKE	IN	45460	Terre Haute, IN
18133	PUTNAM	IN	26900	Indianapolis-Carmel-Anderson, IN
18161	UNION	IN	17140	Cincinnati, OH-KY-IN
21091	HANCOCK	KY	36980	Owensboro, KY
21101	HENDERSON	KY	21780	Evansville, IN-KY
22045	IBERIA	LA	29180	Lafayette, LA
24001	ALLEGANY	MD	19060	Cumberland, MD-WV
24047	WORCESTER	MD	41540	Salisbury, MD-DE
25011	FRANKLIN	MA	44140	Springfield, MA
26155	SHIAWASSEE	MI	29620	Lansing-East Lansing, MI
27075	LAKE	MN	20260	Duluth, MN-WI
28031	COVINGTON	MS	25620	Hattiesburg, MS
31051	DIXON	NE	43580	Sioux City, IA-NE-SD
36123	YATES	NY	40380	Rochester, NY
37049	CRAVEN	NC	35100	New Bern, NC
37077	GRANVILLE	NC	20500	Durham-Chapel Hill, NC
37085	HARNETT	NC	22180	Fayetteville, NC
37087	HAYWOOD	NC	11700	Asheville, NC
37103	JONES	NC	35100	New Bern, NC
37137	PAMLICO	NC	35100	New Bern, NC
42037	COLUMBIA	PA	14100	Bloomsburg-Berwick, PA
42085	MERCER	PA	49660	Youngstown-Warren-Boardman, OH-PA
42089	MONROE	PA	20700	East Stroudsburg, PA
42093	MONTOUR	PA	14100	Bloomsburg-Berwick, PA
42103	PIKE	PA	35084	Newark, NJ-PA
45027	CLARENDON	SC	44940	Sumter, SC
48431	STERLING	TX	41660	San Angelo, TX

FIPS County Code	County Name	State	Current CBSA	Current CBSA Name
49003	BOX ELDER	UT	36260	Ogden-Clearfield, UT
51113	MADISON	VA	47894	Washington-Arlington-Alexandria, DC-VA- MD-WV
51175	SOUTHAMPTON	VA	47260	Virginia Beach-Norfolk-Newport News, VA- NC
51620	FRANKLIN CITY	VA	47260	Virginia Beach-Norfolk-Newport News, VA- NC
54035	JACKSON	WV	16620	Charleston, WV
54043	LINCOLN	WV	16620	Charleston, WV
54057	MINERAL	WV	19060	Cumberland, MD-WV
55069	LINCOLN	WI	48140	Wausau-Weston, WI
72001	ADJUNTAS	PR	38660	Ponce, PR
72055	GUANICA	PR	49500	Yauco, PR
72081	LARES	PR	10380	Aguadilla-Isabela, PR
72083	LAS MARIAS	PR	32420	Mayagüez, PR
72141	UTUADO	PR	10380	Aguadilla-Isabela, PR

Comment

In the proposed FY 2025 Inpatient Rehabilitation Facilities rule, that rule says there are 54 counties moving to rural status.

- **Rural Counties That Would Become Urban (Page 21)**

Under the revised OMB statistical area delineations (based upon OMB Bulletin No. 23-01), a total of 54 counties (and county equivalents) that are currently located in rural areas would be considered located in urban areas. They are as follows.

Rural Counties That Would Change to Urban Status

FIPS County Code	County	State	Proposed CBSA	Proposed CBSA Name
01087	MACON	AL	12220	Auburn-Opelika, AL
01127	WALKER	AL	13820	Birmingham, AL
12133	WASHINGTON	FL	37460	Panama City-Panama City Beach, FL
13187	LUMPKIN	GA	12054	Atlanta-Sandy Springs-Roswell, GA
15005	KALAWAO	HI	27980	Kahului-Wailuku, HI
17053	FORD	IL	16580	Champaign-Urbana, IL
17127	MASSAC	IL	37140	Paducah, KY-IL
18159	TIPTON	IN	26900	Indianapolis-Carmel-Greenwood, IN
18179	WELLS	IN	23060	Fort Wayne, IN
20021	CHEROKEE	KS	27900	Joplin, MO-KS
21007	BALLARD	KY	37140	Paducah, KY-IL
21039	CARLISLE	KY	37140	Paducah, KY-IL
21127	LAWRENCE	KY	26580	Huntington-Ashland, WV-KY-OH
21139	LIVINGSTON	KY	37140	Paducah, KY-IL

FIPS County Code	County	State	Proposed CBSA	Proposed CBSA Name
21145	MC CRACKEN	KY	37140	Paducah, KY-IL
21179	NELSON	KY	31140	Louisville/Jefferson County, KY-IN
22053	JEFFERSON DAVIS	LA	29340	Lake Charles, LA
22083	RICHLAND	LA	33740	Monroe, LA
26015	BARRY	MI	24340	Grand Rapids-Wyoming-Kentwood, MI
26019	BENZIE	MI	45900	Traverse City, MI
26055	GRAND TRAVERSE	MI	45900	Traverse City, MI
26079	KALKASKA	MI	45900	Traverse City, MI
26089	LEELANAU	MI	45900	Traverse City, MI
27133	ROCK	MN	43620	Sioux Falls, SD-MN
28009	BENTON	MS	32820	Memphis, TN-MS-AR
28123	SCOTT	MS	27140	Jackson, MS
30007	BROADWATER	MT	25740	Helena, MT
30031	GALLATIN	MT	14580	Bozeman, MT
30043	JEFFERSON	MT	25740	Helena, MT
30049	LEWIS AND CLARK	MT	25740	Helena, MT
30061	MINERAL	MT	33540	Missoula, MT
32019	LYON	NV	39900	Reno, NV
37125	MOORE	NC	38240	Pinehurst-Southern Pines, NC
38049	MCHENRY	ND	33500	Minot, ND
38075	RENVILLE	ND	33500	Minot, ND
38101	WARD	ND	33500	Minot, ND
39007	ASHTABULA	OH	17410	Cleveland, OH
39043	ERIE	OH	41780	Sandusky, OH
41013	CROOK	OR	13460	Bend, OR
41031	JEFFERSON	OR	13460	Bend, OR
42073	LAWRENCE	PA	38300	Pittsburgh, PA
45087	UNION	SC	43900	Spartanburg, SC
46033	CUSTER	SD	39660	Rapid City, SD
47081	HICKMAN	TN	34980	Nashville-Davidson--Murfreesboro--Franklin, TN
48007	ARANSAS	TX	18580	Corpus Christi, TX
48035	BOSQUE	TX	47380	Waco, TX
48079	COCHRAN	TX	31180	Lubbock, TX
48169	GARZA	TX	31180	Lubbock, TX
48219	HOCKLEY	TX	31180	Lubbock, TX
48323	MAVERICK	TX	20580	Eagle Pass, TX
48407	SAN JACINTO	TX	26420	Houston-Pasadena-The Woodlands, TX
51063	FLOYD	VA	13980	Blacksburg-Christiansburg-Radford, VA
51181	SURRY	VA	47260	Virginia Beach-Chesapeake-Norfolk, VA-NC
55123	VERNON	WI	29100	La Crosse-Onalaska, WI-MN

- **Urban Counties That Would Move to a Different Urban CBSA Under the Revised OMB Delineations** (Page 23)

The following urban counties would shift from one urban CBSA to a new or existing urban CBSA under CMS’ proposal to adopt the revised OMB delineations.

Urban Areas With CBSA Name and/or Number Change

Current CBSA Code	Current CBSA Name	Proposed FY 2025 CBSA Code	Proposed FY 2025 CBSA Name
10380	Aguadilla-Isabela, PR	10380	Aguadilla, PR
10540	Albany-Lebanon, OR	10540	Albany, OR
12420	Austin-Round Rock-Georgetown, TX	12420	Austin-Round Rock-San Marcos, TX
12540	Bakersfield, CA	12540	Bakersfield-Delano, CA
13820	Birmingham-Hoover, AL	13820	Birmingham, AL
13980	Blacksburg-Christiansburg, VA	13980	Blacksburg-Christiansburg-Radford, VA
15260	Brunswick, GA	15260	Brunswick-St. Simons, GA
15680	California-Lexington Park, MD	30500	Lexington Park, MD
16540	Chambersburg-Waynesboro, PA	16540	Chambersburg, PA
16984	Chicago-Naperville-Evanston, IL	16984	Chicago-Naperville-Schaumburg, IL
17460	Cleveland-Elyria, OH	17410	Cleveland, OH
19430	Dayton-Kettering, OH	19430	Dayton-Kettering-Beavercreek, OH
19740	Denver-Aurora-Lakewood, CO	19740	Denver-Aurora-Centennial, CO
21060	Elizabethtown-Fort Knox, KY	21060	Elizabethtown, KY
21780	Evansville, IN-KY	21780	Evansville, IN
21820	Fairbanks, AK	21820	Fairbanks-College, AK
22660	Fort Collins, CO	22660	Fort Collins-Loveland, CO
23224	Frederick-Gaithersburg-Rockville, MD	23224	Frederick-Gaithersburg-Bethesda, MD
23844	Gary, IN	29414	Lake County-Porter County-Jasper County, IN
24340	Grand Rapids-Kentwood, MI	24340	Grand Rapids-Wyoming-Kentwood, MI
24860	Greenville-Anderson, SC	24860	Greenville-Anderson-Greer, SC
25940	Hilton Head Island-Bluffton, SC	25940	Hilton Head Island-Bluffton-Port Royal, SC
26380	Houma-Thibodaux, LA	26380	Houma-Bayou Cane-Thibodaux, LA
26420	Houston-The Woodlands-Sugar Land, TX	26420	Houston-Pasadena-The Woodlands, TX
26900	Indianapolis-Carmel-Anderson, IN	26900	Indianapolis-Carmel-Greenwood, IN
27900	Joplin, MO	27900	Joplin, MO-KS
27980	Kahului-Wailuku-Lahaina, HI	27980	Kahului-Wailuku, HI
29404	Lake County-Kenosha County, IL-WI	29404	Lake County, IL
29820	Las Vegas-Henderson-Paradise, NV	29820	Las Vegas-Henderson-North Las Vegas, NV

Current CBSA Code	Current CBSA Name	Proposed FY 2025 CBSA Code	Proposed FY 2025 CBSA Name
31020	Longview, WA	31020	Longview-Kelso, WA
34740	Muskegon, MI	34740	Muskegon-Norton Shores, MI
34820	Myrtle Beach-Conway-North Myrtle Beach, SC-NC	34820	Myrtle Beach-Conway-North Myrtle Beach, SC
35084	Newark, NJ-PA	35084	Newark, NJ
35154	New Brunswick-Lakewood, NJ	29484	Lakewood-New Brunswick, NJ
35840	North Port-Sarasota-Bradenton, FL	35840	North Port-Bradenton-Sarasota, FL
36084	Oakland-Berkeley-Livermore, CA	36084	Oakland-Fremont-Berkeley, CA
36260	Ogden-Clearfield, UT	36260	Ogden, UT
36540	Omaha-Council Bluffs, NE-IA	36540	Omaha, NE-IA
37460	Panama City, FL	37460	Panama City-Panama City Beach, FL
39100	Poughkeepsie-Newburgh-Middletown, NY	28880	Poughkeepsie-Newburgh, NY
39340	Provo-Orem, UT	39340	Provo-Orem-Lehi, UT
39540	Racine, WI	39540	Racine-Mount Pleasant, WI
41540	Salisbury, MD-DE	41540	Salisbury, MD
41620	Salt Lake City, UT	41620	Salt Lake City-Murray, UT
42680	Sebastian-Vero Beach, FL	42680	Sebastian-Vero Beach-West Vero Corridor, FL
42700	Sebring-Avon Park, FL	42700	Sebring, FL
43620	Sioux Falls, SD	43620	Sioux Falls, SD-MN
44420	Staunton, VA	44420	Staunton-Stuarts Draft, VA
44700	Stockton, CA	44700	Stockton-Lodi, CA
45540	The Villages, FL	48680	Wildwood-The Villages, FL
47220	Vineland-Bridgeton, NJ	47220	Vineland, NJ
47260	Virginia Beach-Norfolk-Newport News, VA-NC	47260	Virginia Beach-Chesapeake-Norfolk, VA-NC
48140	Wausau-Weston, WI	48140	Wausau, WI
48300	Wenatchee, WA	48300	Wenatchee-East Wenatchee, WA
48424	West Palm Beach-Boca Raton-Boynton Beach, FL	48424	West Palm Beach-Boca Raton-Delray Beach, FL
49340	Worcester, MA-CT	49340	Worcester, MA
49660	Youngstown-Warren-Boardman, OH-PA	49660	Youngstown-Warren, OH

- **Urban Counties Moving to a Different Urban CBSA (Page 25)**

The following list of 73 urban counties would move from one urban CBSA to a new or modified urban CBSA, if CMS were to adopt the revised OMB delineations.

Counties That Would Change to a Different Urban CBSA

FIPS County Code	County Name	State	Current CBSA	Current CBSA Name	Proposed FY 2025 CBSA	Proposed FY 2025 CBSA Name
13013	BARROW	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13035	BUTTS	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13045	CARROLL	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13063	CLAYTON	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13077	COWETA	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13085	DAWSON	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13089	DE KALB	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13097	DOUGLAS	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13113	FAYETTE	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13117	FORSYTH	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13121	FULTON	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13135	GWINNETT	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13149	HEARD	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13151	HENRY	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13159	JASPER	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13199	MERIWETHER	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13211	MORGAN	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13217	NEWTON	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13227	PICKENS	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13231	PIKE	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13247	ROCKDALE	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13255	SPALDING	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13297	WALTON	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	12054	Atlanta-Sandy Springs- Roswell, GA
13015	BARTOW	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	31924	Marietta, GA
13057	CHEROKEE	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	31924	Marietta, GA
13067	COBB	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	31924	Marietta, GA
13143	HARALSON	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	31924	Marietta, GA
13223	PAULDING	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	31924	Marietta, GA
21163	MEADE	KY	21060	Elizabethtown-Fort Knox, KY	31140	Louisville/Jefferson County, KY-IN
17097	LAKE	IL	29404	Lake County- Kenosha County, IL-WI	29404	Lake County, IL
55059	KENOSHA	WI	29404	Lake County- Kenosha County, IL-WI	28450	Kenosha, WI
06039	MADERA	CA	31460	Madera, CA	23420	Fresno, CA
47057	GRAINGER	TN	34100	Morristown, TN	28940	Knoxville, TN
37019	BRUNSWICK	NC	34820	Myrtle Beach- Conway-North Myrtle Beach, SC- NC	48900	Wilmington, NC
22103	ST. TAMMANY	LA	35380	New Orleans- Metairie, LA	43640	Slidell-Mandeville- Covington, LA
34009	CAPE MAY	NJ	36140	Ocean City, NJ	12100	Atlantic City- Hammonton, NJ
72023	CABO ROJO	PR	41900	San Germán, PR	32420	Mayagüez, PR
72079	LAJAS	PR	41900	San Germán, PR	32420	Mayagüez, PR

FIPS County Code	County Name	State	Current CBSA	Current CBSA Name	Proposed FY 2025 CBSA	Proposed FY 2025 CBSA Name
72121	SABANA GRANDE	PR	41900	San Germán, PR	32420	Mayagüez, PR
72125	SAN GERMAN	PR	41900	San Germán, PR	32420	Mayagüez, PR
53061	SNOHOMISH	WA	42644	Seattle-Bellevue- Kent, WA	21794	Everett, WA
25015	HAMPSHIRE	MA	44140	Springfield, MA	11200	Amherst Town-Northampton, MA
12103	PINELLAS	FL	45300	Tampa-St. Petersburg-Clearwater, FL	41304	St. Petersburg- Clearwater-Largo, FL
12053	HERNANDO	FL	45300	Tampa-St. Petersburg-Clearwater, FL	45294	Tampa, FL
12057	HILLSBOROUGH	FL	45300	Tampa-St. Petersburg-Clearwater, FL	45294	Tampa, FL
12101	PASCO	FL	45300	Tampa-St. Petersburg-Clearwater, FL	45294	Tampa, FL
39123	OTTAWA	OH	45780	Toledo, OH	41780	Sandusky, OH
51013	ARLINGTON	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51043	CLARKE	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51047	CULPEPER	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51059	FAIRFAX	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51061	FAUQUIER	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51107	LOUDOUN	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51153	PRINCE WILLIAM	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51157	RAPPAHANNOCK	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51177	SPOTSYLVANIA	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51179	STAFFORD	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51187	WARREN	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51510	ALEXANDRIA CITY	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51600	FAIRFAX CITY	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51610	FALLS CHURCH CITY	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51630	FREDERICKSBURG CITY	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51683	MANASSAS CITY	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
51685	MANASSAS PARK CITY	VA	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV
54037	JEFFERSON	WV	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	11694	Arlington-Alexandria- Reston, VA-WV

FIPS County Code	County Name	State	Current CBSA	Current CBSA Name	Proposed FY 2025 CBSA	Proposed FY 2025 CBSA Name
11001	THE DISTRICT	DC	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	47764	Washington, DC-MD
24017	CHARLES	MD	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	47764	Washington, DC-MD
24033	PRINCE GEORGES	MD	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	47764	Washington, DC-MD
24009	CALVERT	MD	47894	Washington- Arlington- Alexandria, DC- VA-MD-WV	30500	Lexington Park, MD
24037	ST. MARYS	MD	15680	California- Lexington Park, MD	30500	Lexington Park, MD
72059	GUAYANILLA	PR	49500	Yauco, PR	38660	Ponce, PR
72111	PENUELAS	PR	49500	Yauco, PR	38660	Ponce, PR
72153	YAUCO	PR	49500	Yauco, PR	38660	Ponce, PR

- **Proposed Transition Period** (Page 30)

CMS says it believes that the permanent 5-percent cap on wage index decreases would be sufficient to mitigate any potential negative impact for hospices serving beneficiaries in areas that are impacted by the proposal to adopt the revised OMB delineations and that no further transition is necessary.

Nonetheless, CMS is proposing for FY 2025, that the 5-percent cap would also be applied to counties that would move from a CBSA or statewide rural area with a higher wage index value into a new CBSA or rural area with a lower wage index value, so that the county's FY 2025 wage index would not be less than 95 percent of the county's FY 2024 wage index value under the old delineation despite moving into a new delineation with a lower wage index.

CMS is also proposing that in order to capture the correct wage index value, the county would continue to use the assigned 50XXX transition code until the county's wage index value calculated for the that fiscal year using the new OMB delineations is not less than 95 percent of the county's capped wage index from the previous fiscal year.

The counties that will require a transition code and the corresponding 50XXX codes are shown in the table below and will also be shown in the last column of the FY 2025 hospice wage index file. (Page 33)

Counties That Will Use a Wage Index Transition Code

FIPS Code	County Name	State	FY 2024 CBSA	FY 2024 CBSA Name	Proposed FY 2025 CBSA	Proposed FY 2025 CBSA Name	Proposed Transition Code
01129	WASHINGTON	AL	33660	Mobile, AL	99901	ALABAMA	50001
13171	LAMAR	GA	12060	Atlanta-Sandy Springs-Alpharetta, GA	99911	GEORGIA	50002
15005	KALAWAO	HI	99912	HAWAII	27980	Kahului-Wailuku, HI	50003
16077	POWER	ID	38540	Pocatello, ID	99913	IDAHO	50004
17183	VERMILION	IL	19180	Danville, IL	99914	ILLINOIS	50005
18133	PUTNAM	IN	26900	Indianapolis- Carmel-Anderson, IN	99915	INDIANA	50006
21101	HENDERSON	KY	21780	Evansville, IN-KY	99918	KENTUCKY	50007
24009	CALVERT	MD	47894	Washington- Arlington-Alexandria, DC- VA-MD-WV	30500	Lexington Park, MD	50008
24047	WORCESTER	MD	41540	Salisbury, MD-DE	99921	MARYLAND	50009
25011	FRANKLIN	MA	44140	Springfield, MA	99922	MASSACHUSETTS	50010
26155	SHIAWASSEE	MI	29620	Lansing-East Lansing, MI	99923	MICHIGAN	50011
27075	LAKE	MN	20260	Duluth, MN-WI	99924	MINNESOTA	50012
27133	ROCK	MN	99924	MINNESOTA	43620	Sioux Falls, SD-MN	50013
32019	LYON	NV	99929	NEVADA	39900	Reno, NV	50014
36123	YATES	NY	40380	Rochester, NY	99933	NEW YORK	50015
37077	GRANVILLE	NC	20500	Durham-Chapel Hill, NC	99934	NORTH CAROLINA	50016
37087	HAYWOOD	NC	11700	Asheville, NC	99934	NORTH CAROLINA	50017
39123	OTTAWA	OH	45780	Toledo, OH	41780	Sandusky, OH	50018
42103	PIKE	PA	35084	Newark, NJ-PA	99939	PENNSYLVANIA	50019
51113	MADISON	VA	47894	Washington- Arlington-Alexandria, DC- VA-MD-WV	99949	VIRGINIA	50020
51175	SOUTHAMPTON	VA	47260	Virginia Beach- Norfolk-Newport News, VA-NC	99949	VIRGINIA	50021
51620	FRANKLIN CITY	VA	47260	Virginia Beach- Norfolk-Newport News, VA-NC	99949	VIRGINIA	50021
54057	MINERAL	WV	19060	Cumberland, MD- WV	99951	WEST VIRGINIA	50022
72001	ADJUNTAS	PR	38660	Ponce, PR	99940	PUERTO RICO	50023
72023	CABO ROJO	PR	41900	SanGermán, PR	32420	Mayagüez, PR	50024
72055	GUANICA	PR	49500	Yauco, PR	99940	PUERTO RICO	50025
72079	LAJAS	PR	41900	San Germán, PR	32420	Mayagüez, PR	50024
72081	LARES	PR	10380	Aguadilla-Isabela, PR	99940	PUERTO RICO	50026
72083	LAS MARIAS	PR	32420	Mayagüez, PR	99940	PUERTO RICO	50027
72121	SABANA GRANDE	PR	41900	San Germán, PR	32420	Mayagüez, PR	50024
72125	SAN GERMAN	PR	41900	San Germán, PR	32420	Mayagüez, PR	50024
72141	UTUADO	PR	10380	Aguadilla-Isabela, PR	99940	PUERTO RICO	50026

Comment

Please be careful when using the proposed CBSA delineations. After completing my analysis of the proposed FY 2025 Inpatient Rehabilitation Facilities rule and this rule, their appears to be some differences in the wage index tables for each.

Proposed Updates to the Hospice Quality Reporting Program (HQRP)(Page 51)

CMS proposes adding two new process measures to the HQRP, *Timely Reassessment of Pain Impact* and *Timely Reassessment of Non-Pain Symptom Impact*, expected to begin in FY 2028. These two measures would use the data that the new Hospice Outcomes and Patient Evaluation (HOPE) instrument will collect. These process measures would reflect whether a follow-up visit occurred within 48 hours of an initial assessment where there was an impact of moderate or severe symptoms with and without pain.

This rule also proposes to adopt and implement the HOPE patient-level data collection tool, beginning with FY 2025, and functionally replace the existing Hospice Item Set (HIS) structure upon implementation. HOPE will collect data at multiple time points across the hospice stay, including admission, the HOPE Update Visit (HUV), and discharge. Compared to the HIS (which only collected data at hospice admission and discharge), CMS says HOPE will enable the agency to gather patient level data during their hospice stay to support quality measures. HOPE includes several domains that are new or expanded relative to HIS, including:

- Sociodemographic (updated)
- Diagnoses (expanded)
- Symptom Impact Assessment
- Imminent death

This proposed rule requests stakeholder input on potential data collection items related to four social determinants of health (SDOH) (housing instability, food insecurity, utility, and transportation challenges) that may be relevant to the hospice setting and how they may need to be adapted to be better suited for the hospice setting.

Finally, the proposal changes to the Hospice CAHPS Survey based on the results of a mode experiment conducted in 2021. Specifically, the changes being proposed are:

- The addition of a web-mail mode (email invitation to a web survey, with mail follow-up to non-responders),
- A shortened and simplified survey,
- Modifications to survey administration protocols to include a prenotification letter and extended field period,
- The addition of a new, two-item Care Preferences measure,
- Revisions to the existing Hospice Team Communication measure and the existing Getting Hospice Care Training measure,
- The removal of three nursing home items and additional survey items impacted by other proposed changes in this rule.

The Hospice Special Focus Program (SFP) algorithm uses data from four measures related to caregiver experience collected by the CAHPS Hospice Survey, including Help for Pain and Symptoms, Getting Timely Help, Willingness to Recommend this Hospice, and Overall Rating of this Hospice. This proposed rule includes changes to the Overall Rating of this Hospice measure that are non-substantive and will not impact the SFP algorithm.

Final Thoughts

Again, the quality material is extensive – more than 40 pages. There is much detail regarding both the HOPE and SDOH requirements than can be reported here.

The adoption of the new wage index area delineations will result in winners and losers. While CMS is trying to limit the impact of the changes, individual facilities need to pay close attention to the proposals as it will impact revenue.